IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

LAURA HOFFMAN, et al.	)	**CASE NO.: 1:18-CV-00309**
	)	
Plaintiffs,	)	**JUDGE: CHRISTOPHER A. BOYKO**
	)	
	)	
vs.	)	**DEFENDANTS' RESPONSE TO**
	)	**PLAINTIFFS' MOTION FOR**
MICHAEL C. O'MALLEY, et al.,	)	**EXTENSION OF DEADLINE FOR**
	)	**SUBMITTING EXPERT REPORTS**
Defendants.	)	

COME NOW Defendants Cuyahoga County, Michael C. O'Malley, Jennifer Driscoll, Gregory Mussman, and Joanna Whinery, by and through undersigned counsel, and hereby submit their response to Plaintiffs' Motion for Extension of Deadline for Submitting Expert Reports. Defendants do not oppose Plaintiff's request for an extension of the deadline to product their expert reports, provided that any extension of Plaintiffs' deadline also includes a commensurate extension of Defendants' deadline to produce their expert reports.

Fairness requires that Defendants be afforded the same amount of time to submit their expert reports after they have been provided Plaintiffs' expert reports. Moreover, pushing back the expert deadlines will require a re-setting by the Court of the trial date in this matter, which is currently set for April 20, 2020. If the Court is unwilling to reschedule the trial date and also extend Defendants' expert report submission, then Defendants would have to object to any unilateral extension of Plaintiffs' deadline to submit their expert report, as this would fail to provide Defendants adequate time for

their expert to review Plaintiff's reports and prepare Defendants' report.

Respectfully submitted,

MICHAEL C. O'MALLEY, Prosecuting Attorney of Cuyahoga County, Ohio

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